

UNITED STATES GOVERNMENT

Memorandum

TO : Paul Elliot, Chief
Emergency Response Section

DATE: February 12, 1979

FROM : Fred N. Rubel, Chief *Fred Rubel*
Emergency Response & Inspection Branch

SUBJECT: Inspection and Sampling Activity this Month at Bridgeport Rental
and Oil Service Co., Bridgeport, New Jersey

The actual date for this inspection, originally set for February 14, 1979 is uncertain. Rick Spear has agreed that you will serve as field coordinator for this activity. Note that this inspection will be under the authority of a court issued document.

Specific activities to be addressed during the inspection are:

- a. Upon arrival at the facility, credentials are to be shown. Once in contact with the person in charge of the facility, the court papers are to be presented and an explanation of what the inspection will consist of should be given. Those interviewed should be informed that they are not required to make statements although their cooperation is being sought and is required. Sue Levine has determined that a Miranda warning is not required. She discussed this with Rich Tisch and others (OJI).
- b. Sonic analysis of the oil lagoon wall, particularly adjacent to the wetland (ensure your contact is set up and keyed into the operation) should be accomplished if the lagoon wall is one which may lend itself to being breached.
- c. Ensure that samples are taken of any oil-like material in the wetland adjacent to the lagoon. Mark Haulenbeek already knows that samples of the lagoon itself are to be taken.
- d. A careful documentation of events is to be made in the event that we have to take court action or a Section 311 (k) funded cleanup is necessary. The Coast Guard's blue "Pollution Incident Workbook" may be useful in this regard. Careful note should be made of any evidence that oil is getting from the lagoon to the wetlands. Take ample photographs.
- e. An SPCC inspection is to occur. Please be sure to leave the facility representative a copy of the inspection check off sheet, and advise him of any suspected violation.

Set for Feb 28, 1979



5010-108

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- f. As part of the inspection, existing records on site should be recorded, i.e., "two green looseleaf logs of invoices, three file draws of customer receipts . . . ". A review of existing documents should be made to identify clients of Bridgeport Rental, especially any customers which dump liquid wastes. Flash pictures should be taken of documents and records encountered for purpose of later identification (Hershel has flash-type cameras). If possible, the numbers of pages should be recorded for various books. A careful search should be made to uncover any documents indicating chemical analysis of wastes, particularly any showing PCB's. In short, a careful review of company records must be undertaken. A portable photocopier might be valuable if one can be obtained.
- g. A characterization of the operation which exists should be attempted, i.e., "receives bulk oil and packages for retail distribution, re-refines waste oils".
- h. Special note should be made at any outfalls from the property.
- i. I would suggest having all field persons use cameras to ensure sufficient visual documentation of activities.
- j. I would also suggest all field persons be equipped with walkie talkies to ensure that the whereabouts of each person is readily known.
- k. Ask about the presence of transformers or transformer fluids. Also ask if any PCB liquids are present. If so, check for any labeling, describe the storage location, have a sample taken if possible. Ask if they have any records indicating the receipt or presence of PCB containing liquids. Ask whether anything other than liquids have been dumped into the lagoon.
- l. Be certain that after the site visit each participant from EPA submits a signed statement of their activities. Note, it will be part of your responsibility to ensure a well documented case concerning any violations uncovered. You will be responsible for submitting an overall report.
- m. Chain of custody forms should be available if needed as should EPA sample collection forms.
- n. You may wish to bring extra copies of the prevention regulations in the event that the facility claims no knowledge of the regulations.

- o. Prior to leaving, you should advise the facility of any suspected violations uncovered.

Note that the S&M Branch will conduct sampling and well drilling at various locations both on and off site. Rick has indicated that any sampling of storage tanks would be up to us, though. If possible, I would like to have samples taken (particularly of the top layer) from storage tanks. It may be necessary for ER&I staff to do this so be prepared to do so.

Please ensure that safety procedures are followed, keeping in mind that the liquids (and gases) being dealt with here may be dangerous.

No attorney is scheduled to accompany your inspection group. I would suggest you take the Response Vehicle so that you have a portable telephone and necessary safety equipment.

CC: B. Metzger
R. Spear
S. Levine
G. Kimbal
J. Yezzi

2-SA-ER

April 14, 1975

SPCC Violation - Bridgeport Rental and Oil Service Company,
Bridgeport, New Jersey

Director, Enforcement and
Regional Counsel Division
EPA, Region II
26 Federal Plaza
New York, New York 10007

ATTN: Henry Gluckstern, Water Enforcement Branch

THRU: W. J. Librizzi, Chief, Emergency Response & Inspection Branch

THRU: R. T. Dewling, Director, Surveillance & Analysis Division

Forwarded to Richard Flye on April 11 were a report of investigation and laboratory analysis regarding an SPCC inspection and oil discharge at the Bridgeport Rental and Oil Service Company, Bridgeport, New Jersey. Since the oil waste lagoon has showed evidence of leakage and is potentially an environmental hazard, we are of the opinion that a strong SPCC Plan must be prepared and implemented immediately. We have discussed the matter with Bridgeport corporate officials and their Professional Engineer retained to prepare the Plan. It is our intention, in the next 2-3 weeks, to meet with these people to discuss the requirements of the Plan.

It is recommended that the initial assessment of a civil penalty be such as to compel the owners to take the necessary corrective action.

Paul R. Elliot
Chief
Emergency Response Section

cc: R. Baker
Status of Compliance Branch

SA/ERB:WLibrizzi:ade:Bldg.209:x592:4/14/75

CONCURRENCES

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| SYMBOL | SA/ERB | SA/ERB | SA/DIR | | | | | |
| SURNAME | ELLIOT | LIBRIZZI | DEWLING | | | | | |
| DATE | | | | | | | | |

2-SA-ER

April 7, 1975

Inspection of Bridgeport Rental and Oil Service Company, Logan
Township, New Jersey

File

At 1:00 p.m. on 1 April 1975, Bill Librizzi received a phone call from the U. S. Coast Guard COTP, Philadelphia, reporting that a telephone report had just been received from a Mr. Swidell who stated that oil was leaking from the oil lagoon into one of the adjacent clean lakes. The Coast Guard stated that the telephone company had been installing new poles and had punched a hole in the road, running between the oil lagoon and the clean lake. This hole began seeping oil from the lagoon, which then flowed into the lake at approximately 100 gallons/day. The Coast Guard wanted to know what action we would take. After calling the New Jersey State Department of Environmental Protection (NJSDEP), it was arranged that we would meet with the Coast Guard and the NJSDEP at Bridgeport at 4:00 p.m. to evaluate the spill.

Bill Librizzi and I arrived on scene at 3:40 p.m. and went to the spill site. A dirt road ran between the oil lagoon and the lake. This road was above the level of both the oil lagoon and the lake. The oil lagoon level was about 6-8 feet higher than the lake level. A hole had been dug in the lake shoreline about one foot from the water. Oil had slowly filled the hole and was seeping out of the hole into the lake. Approximately 10-15 gallons of oil was in the lake. A section of Coastal Services oil boom had been installed at the point of seepage and was containing 100 percent of the oil getting into the lake. Approximately 25-30 yards of shoreline around the point of oil seepage appeared wet with oil. In this area, several small holes were dug. These also filled with oil indicating that the entire area was oil saturated. Samples were taken of the oil in the lagoon, the oil that seeped into the holes dug into the shoreline, and the oil in the lake.

By this time, representatives from the Coast Guard and the NJSDEP were on scene. After the samples were taken, we began to walk around the lake. There was evidence at the western end of the oil lagoon where the swampy area of Little Timber Creek lies next to the lagoon that oil had escaped into the swampy area. Scott McCone, the NJSDEP representative, indicated that a survey of the swamp area had been conducted by air and by land and that anywhere from 100,000 to 3,000,000 gallons of oil had spilled from the oil lagoon and was trapped in the swamp. The Coast Guard estimated that 5,000 to 10,000 gallons were

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| PRICE | ELLIOT | LIBRIZZI |

located within the swamp. The figures varied so widely because the depth of the oil throughout the swamp had not been determined. During our superficial survey from the edge of the swamp, only scattered patches of floating oil were visible. However, oil stains on roots were universally evident with a large portion of the swamp dead or dying.

We then went to speak with the owners of the facility. Mr. Denecola, the facility operator, was still at the facility but both owners had left. Attempts to reach them to ask them to return for a meeting were unsuccessful. We then told Mr. Denecola about the seepage and he indicated that he would clean up the oil in the water tomorrow. Mr. Librizzi asked that one of the owners call him at 8:30 a.m. on April 2. We left the facility at 5:45 p.m.

At 6:15 p.m. we arrived at the Coastal Services office in Paulsboro to talk with Mark Shipps, the Coastal Services office manager, on the survey of the Bridgeport Rental and Oil Service Company facility he had made. He was not in, but Mr. Swindell, the owner of the land (including a portion of the pond being effected by the seepage) near the Bridgeport facility and the man who had asked Coastal Services to install the boom, was in the office. Bill Librizzi discussed the situation with him. He indicated that the two lakes located north and east of the oil lagoon were interconnected and that the lake to the north of the lagoon was connected with Little Timber Creek. He also indicated that there is no inflow of water to the pond.

At 6:40 p.m. we left Coastal Services after leaving a message for Mark Shipps to call Bill Librizzi early on April 2.

At 8:00 p.m. we arrived at the Edison office.

Clark K. Price
Pollution Spills Investigator
Emergency Response Section

2-SA-ER

April 8, 1975

Bridgeport Rental and Oil Service Company, Inc.

File

At 8:20 a.m. on 8 April 1975, I called COTP Philadelphia to ask if a follow-up inspection of Bridgeport Rental and Oil Storage had been made following our visit of 1 April to insure that the oil in the clean lake had been cleaned up. Lt. Thompson indicated that the oil had been cleaned up and he would send a man down today to determine if oil seepage was continuing.

Lt. Thompson also stated that he had received a phone call from Bridgeport Rental and Oil Service Company asking that the Coast Guard attend a meeting between the NJSDEP and Bridgeport that was scheduled for 9 April. Lt. Thompson was unsure of the exact reason for the meeting and how it relates to the court case against Bridgeport scheduled to begin on 14 April.

Clark K. Price
Pollution Spills Investigator
Emergency Response Section

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CONCURRENCES

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| SURNAME | PRICE | ELLIOT | LIBRIZZI | | | | | |
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